

1 MELINDA HAAG (CABN 132612)
United States Attorney

2 J. DOUGLAS WILSON (DCBN 412811)
3 Chief, Criminal Division

4 AMANDA BECK (CABN 287767)
5 Special Assistant United States Attorney
6 1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3680
Facsimile: (510) 637-3724
7 E-Mail: amanda.beck@usdoj.gov

8 Attorneys for the United States of America

FILED

MAR 19 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,) CASE NO. 14-CR-043 JST
14 Plaintiff,)
15 v.) STIPULATION AND [PROPOSED] ORDER TO
16 SANTWAN SAMUEL EDWARDS,) EXCLUDE TIME
a/k/a Santwan Edwards,)
a/k/a Samuel Washington,)
a/k/a Santwan S. Edwards,)
17)
18 Defendant.)
19)

20 On March 7, 2014, the parties made their initial appearance before U.S. District Judge Jon S.
21 Tigar. At that time, the parties advised the court that they were still investigating this case. They expect
22 to have finished this initial investigation and to have concluded by April 11, 2014 whether the parties
23 will enter a plea agreement or file motions in the case. Therefore, Judge Tigar scheduled the case's next
24 status or motion-setting appearance for April 11, 2014 and, at the request of both parties, agreed to
25 exclude time until that appearance.

26 Therefore, with the agreement of the parties and with the consent of the defendant, the Court
27 enters this order documenting the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(b),
28 from March 7, 2014 to April 11, 2014. The parties agree, and the Court finds and holds, as follows:

STIPULATION AND [PROPOSED] ORDER TO EXCLUDE TIME
CR 14-043 JST

1. The defendant is currently residing in a half-way house.

2. Through his counsel, the defendant agrees to an exclusion of time under the Speedy Trial Act from March 7, 2014 to April 11, 2014. This exclusion will allow defense counsel to effectively prepare and to research legal issues pertaining to the case.

3. Counsel for the defense believes that the exclusion of time is in his client's best interest.

4. Given these circumstances, the Court finds that the ends of justice are served by excluding the period from March 7, 2014 to April 11, 2014 and that this outweighs the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

5. Accordingly and, through his counsel, with the consent of the defendant, the Court orders that the period from March 7, 2014 to April 11, 2014 shall be excluded from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(7)(A) & (B)(iv).

IT IS SO STIPULATED.

DATED: March 10, 2014

/s/
ANGELA M. HANSEN
Counsel for Juan Escoto Ruiz

DATED: March 10, 2014

/s/
AMANDA BECK
Special Assistant United States Attorney

IT IS SO ORDERED.

DATED: 3/19/14

HON. JON S. TIGAR
United States District Judge